

FILED  
Clerk  
District Court

MAY 31 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

1 **JOE HILL**  
HILL LAW OFFICES  
2 P.O. Box 500917  
Saipan, MP 96950  
3 Phone: (670) 234-6806/7743  
FAX: (670) 234-7753

4 Attorney for Plaintiff

5  
6 **IN THE UNITED STATES DISTRICT COURT**  
**FOR THE**  
7 **COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

8 **MOHAMMED SAYED,**

9 **Plaintiff,**

10 **vs.**

11 **NATHANAEL BUSINESS**  
**MARKETING CO., and SANG**  
12 **KUK KIM, in his individual**  
**capacity, SAIPAN LUCKY**  
13 **CORPORATION, and CHO, JUNG**  
14 **DUK, in his individual and official**  
**capacity,**

15 **Defendants.**

**Civil Action No. 04-0024**

**NOTICE/THIRD MOTION FOR**  
**ORDER IN AID OF**  
**JUDGMENT/DECLARATION OF**  
**JOE HILL/(PROPOSED) ORDER**  
**IN AID OF JUDGMENT**

Date: July 20, 2006

Time: 9:00 a.m.

Judge: Hon. Alex R. Munson

16 **NOTICE OF MOTION**

17 PLEASE TAKE NOTICE that the undersigned will bring the attached motion for hearing  
18 before the United States District Court for the Northern Mariana Islands at the Horiguchi  
19 Building, Garapan Village, Island of Saipan, Commonwealth of the Northern Mariana  
20 Islands on July 20, 2006 at 9:00 a.m.

ORIGINAL

JOE HILL  
Attorney at Law  
Hill Law Offices ~ Susupe  
P.O. Box 917 ~ Saipan MP 96950 ~ (670) 234-6806/7743 ~ FAX: 234-7753 ~ email: joe.hill@saipan.com

**MOTION**

NOW COMES Plaintiff Mohammed Sayed, by and through his attorney, Joe Hill, and hereby moves this Court for an Order in Aid of Judgment in that on November 4, 2004, the clerk of court entered default and default judgment, attached hereto as *Exhibit "1"* against Defendants Saipan Lucky Corporation and Cho, Jung Duk, ordering said defendants, jointly and severally, to pay Plaintiff the Judgment amounts as follows:

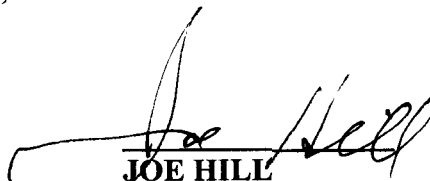
1. Unpaid overtime wages in the amount of \$3,489.93;
2. Prejudgment interest in the sum of \$331.64;
3. Liquidated damages in the sum of \$3,489.93; and
4. Attorney's fees and costs in the sum of \$6,035.50.

Plaintiff filed a Second Motion for Order in Aid of Judgment on January 07, 2005.

Defendants have and continue to fail to pay the Judgment.

Plaintiff, now moves for an Order in Aid of Judgment to examine Defendants Saipan Lucky Corporation and Cho, Jung Duk's ability to pay and to determine the fastest manner in which Defendants can pay the judgment amounts set forth in the Judgment dated November 04, 2004.

Dated this 31 day of May, 2006.

  
**JOE HILL**  
Attorney for Plaintiff

**COPY of**  
Original Filed  
on this date

**NOV - 4 2004**

Clerk  
District Court  
For The Northern Mariana Islands

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

**MOHAMMED SAYED,**

**Plaintiff,**

**vs.**

**NATHANAEL BUSINESS  
MARKETING CO., and  
SANG KUK KIM, in his  
individual and official  
capacity, SAIPAN LUCKY  
CORPORATION, and CHO,  
JUNG DUK, in his individual  
and official capacity,**

**Defendants.**

**Civil Action No. 04-0024**

**ORDER ON ENTRY OF  
DEFAULT AND DEFAULT  
JUDGMENT**

After considering Plaintiff Mohammed Sayed's request for entry of default and for default judgment against Defendant Saipan Lucky Corporation and Cho, Jung Duk the affidavits, and other evidence on file, the record supports entry of default and default judgment. Therefore, the default and default judgment is entered against Defendants Saipan Lucky Corporation and Cho, Jung Duk, jointly and severally. Defendants shall pay to Plaintiff Mohammed Sayed the following:

**EXHIBIT " 1 " —**

1. Unpaid overtime wages in the amount of \$3,489.93;
2. Prejudgment interest in the sum of \$ 331.64;
3. Liquidated damages in the sum of \$ 3,489.93; and
4. Reasonable attorney's fees and costs in the sum of \$ 6,035.50.

ENTERED this 4<sup>th</sup> day of November 2004.

  
\_\_\_\_\_  
Galo L. Perez  
Clerk